

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JANE DOE,

Civil Action No. 20-CV-03908

Plaintiff,

-against-

KEVIN CAHILL,

Defendant.  
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**NOTICE OF MOTION TO PROCEED UNDER A  
PSEUDONYM AND FOR A PROTECTIVE ORDER**

PLEASE TAKE NOTICE, the undersigned attorneys move this Court to allow the Plaintiff in the above captioned action to proceed under the pseudonym “Jane Doe” for the reasons set forth in the attached Plaintiff’s Memorandum of Law in Support of Plaintiff’s Motion to Proceed Under a Pseudonym and for a Protective Order and the Declaration of Aurore C. DeCarlo, Esq.

Dated: Brooklyn, New York  
May 20, 2020

C.A. GOLDBERG PLLC

By: /s/ Aurore C. DeCarlo  
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